Romano & Associates

Attorneys at Law

220 Old Country Road, 1st Floor Mineola, New York 11501 (516) 248-8880 Fax (516) 740-0866 info@romanofirm.com www.romanofirm.com Admitted to N.Y. & N.J. Bar

March 15, 2015

United States District Court Eastern District of New York 100 Federal Plaza Central Islip, New York 11722-9014

Re: Israel Rivera v. City-Wide Sewer & Drain Service

Corp., Long Island Plumbing Corp., Emergency Flood

Restoration, Inc. and Salvatore Mangia, Jr. Civil Action No. 14-cv-06484 (CBA) (MDG)

Dear Honorable Go:

Pursuant to your Order, dated January 6, 2015 the parties herein were scheduled for an Initial Conference set for January 13, 2015 at 11:15 a.m. which was rescheduled for Monday, March 16, 2015 at 11:00AM.

The above-referenced adjournment was based on the fact that the parties scheduled a mediation with Ruth D. Raisfeld, Esq. of Alternative Re on February 27, 2015 ("Mediation Date"). The Mediation Date was adjourned to March 27, 2015 due to a death in the family of Plaintiff's counsel, Michael J. Romano. Currently the parties are cooperatively engaging in informal discovery and preparation for the scheduled mediation.

With that being said, counsel for all parties herein kindly request an adjournment of the initial conference set for March 16, 2015 until one (1) week after mediation has been completed to allow for a prospective resolution of this matter through mediation. We respectfully request that this Court adjourn this matter until April 7, 2015 or another date that is convenient to the court. Our office tried to reach opposing counsel on Sunday evening, and understandably could not reach them. We have not obtained their consent, but do not anticipate that opposing counsel would have issues with the adjournment due to the upcoming mediation.

I sincerely apologize for the delayed notice. My office inadvertently mis-calendered the date for this Initial Conference and failed to confirm with opposing counsel last week regarding the adjournment of this Initial Conference which delayed the ECF filing of this letter request to this honorable Court for the adjournment. I will be at a deposition in New Jersey tomorrow related to a federal matter pending in New Jersey District Court, which begins at 10am.

Thank you in advance for your courtesy and assistance with this matter. We patiently await the Court's decision regarding our request.

Very Truly Yours,

Michael J. Romano (MR7905)

MJR/bms

cc: Brent E. Pelton, Esq. (BEP) (via ECF)